

## EXHIBIT S

2016-004750  
SF-C. Depoian

**ORIGINAL**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ELIEZER LOPEZ and SUHAIL  
LAUREANO,

Plaintiffs,

Index No.

vs.

17 CV

CITY OF NEW YORK, LUIS LINARES,  
LUIS ANGELES, and JOHN DOES #1-3

00181

(LAP)

Defendants.

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July 13, 2018

10:05 a.m.

Deposition of STEVEN ALFANO, held at the  
offices of Emery Celli Brinckerhoff & Abady  
LLP, 600 Fifth Avenue, New York, New York,  
pursuant to Notice, before Jeremy Frank, a  
Notary Public of the State of New York.

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ORIGINATOR

2 A P P E A R A N C E S:

3

4 EMERY CELLI BRINCKERHOFF & ABADY LLP  
5 Attorneys for Plaintiffs

6 600 Fifth Avenue, 10th Floor

7 New York, NY 10020

8 BY: ALI FRICK, ESQ.

9 AFrick@ecbalaw.com

10 EARL WARD, ESQ.

11 EWard@ecbalaw.com

12 (212) 763-5000

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NEW YORK CITY LAW DEPARTMENT  
Office of the Corporation Counsel  
Attorneys for Defendants

17 100 Church Street

18 New York, NY 10007

19 BY: RACHEL SELIGMAN, ESQ.

20 RSeligma@law.nyc.gov

21 CAROLYN K. DEPOIAN, ESQ.

22 CDepoian@law.nyc.gov

23 (212) 356-2358

24

25 (Appearances continued)

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2 A P P E A R A N C E S (continued)

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4 NEW YORK POLICE DEPARTMENT

5 Attorneys for Defendants

6 One Police Plaza

7 New York, NY 10038

8 BY: MICHAEL PUMA, ESQ.

9 Michael.puma@nypd.org

10 (646) 610-5825

11

12 ALSO PRESENT:

13 WILLIAM GOSLING

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Alfano

2 A. Yes.

### Q. How often?

4                   A. Whenever they put in a class, it  
5 could vary.

6 Q. In a typical year how many times  
7 do you give the instruction for the class?

8               A.     Could be from one to maybe three  
9     times, four times.

10 Q. Have you taught any class this  
11 year yet in 2018?

12                   A.       I believe I have taught one or  
13       two.

14 Q. How many years have you been  
15 teaching?

16                   A.       I would say maybe three, four  
17   years.

18 Q. What do you teach your subjects  
19 about what investigative steps they should  
20 take in investigating a level three incident?

21 A. Depicted by the type of incident.

22 Q. It is a level three incident.

23           A.       Okay, well, there is different  
24       sorts of level three incidents. There is ones  
25       where people jump over a fence and there is no

1 Alfano

2 complainant. I mean if you have nobody making  
3 a complaint, you try to get as much evidence  
4 that is related to the incident that you  
5 believe is necessary.

6 Q. Why do you make an investigation  
7 if there's no nobody making a complaint?

8           A.     Because this is how they determine  
9        level three incidents and what they want to be  
10      investigated due to the nature of their  
11      injury.

12 Q. Who is they?

13 A. They is the NYPD.

14 Q. Why do they want you to  
15 investigate level three incidents if there is  
16 no complaint?

17                   A.       To try to discover how we got the  
18       injury.

19 Q. To look for the truth, right?

20 A. Yes.

21 Q. So in all of your investigations  
22 you're looking for the truth?

23 A. Of course.

Q. So it doesn't actually matter whether there is a complaint or not; isn't it?